

## Bill Cash

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**From:** Bill Cash  
**Sent:** Thursday, October 12, 2023 8:14 AM  
**To:** VanDoorne, Katelyn  
**Cc:** Sims, Nancy  
**Subject:** Re: Gromov v. Belkin - request for deposition dates

Depositions. Is any Belkin lawyer willing to get on the phone and work this out today? Rather than emailing about it, we could get on the phone now and work it out.

Bill Cash III  
Levin Papantonio Rafferty  
Pensacola, Fla.  
Direct: 850-435-7059  
Mobile: 614-264-1342

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**From:** VanDoorne, Katelyn <Katelyn.Vandoorne@bakermckenzie.com>  
**Sent:** Thursday, October 12, 2023 8:01:37 AM  
**To:** Bill Cash <bcash@levinlaw.com>  
**Cc:** Sims, Nancy <Nancy.Sims@bakermckenzie.com>  
**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

Could you please expound on what the subject matter of the meet and confer would be? In other words, what do you anticipate the motion for sanctions or the conference with the judge will be about?

Katelyn

**Katelyn VanDoorne**  
Associate, Litigation & Government Enforcement  
Baker & McKenzie LLP  
300 East Randolph Street, Suite 5000  
Chicago, IL 60601 United States  
Tel: +1 312 861 3700  
Fax: +1 312 698 2878  
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**From:** Bill Cash <bcash@levinlaw.com>  
**Sent:** Thursday, October 12, 2023 9:38 AM  
**To:** VanDoorne, Katelyn <Katelyn.Vandoorne@bakermckenzie.com>  
**Subject:** [EXTERNAL] Re: Gromov v. Belkin - request for deposition dates

Katelyn,

What is your availability to talk today? I want to confer with you on a motion for sanctions and/or a conference with the judge.

I called your number but you did not pick up.

Bill Cash III  
Levin Papantonio Rafferty  
Pensacola, Fla.  
Direct: 850-435-7059  
Mobile: 614-264-1342

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Sent:** Thursday, October 12, 2023 7:28:10 AM  
**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>  
**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

As you know from our previous correspondence regarding your requests for Ms. Wei's availability for a deposition, we indicated that we would look into it. October 23, 24, and 25th do not work.

I also note that I responded to your request for the location of Mr. Kalra's deposition. For your convenience, I've reattached that email and included that information again below.

The location will be Baker & McKenzie's Los Angeles office: 10250 Constellation Blvd, Suite 1850, Los Angeles, CA 90067

Best,  
Katelyn

**Katelyn VanDoorne**  
Associate, Litigation & Government Enforcement  
Baker & McKenzie LLP  
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**Baker  
McKenzie.**

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**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Sent:** Wednesday, October 11, 2023 2:25 PM

**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>  
**Subject:** [EXTERNAL] RE: Gromov v. Belkin - request for deposition dates

Following up once again. Can Wei be made available on the 23rd, 24th, or 25th?

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502  
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**From:** Bill Cash

**Sent:** Tuesday, October 10, 2023 9:42 AM

**To:** 'VanDoorne, Katelyn' <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>  
**Subject:** RE: Gromov v. Belkin - request for deposition dates

Katelyn,

I want to lock in Kalra on the 24th. Please give me the location and I will issue a notice for 10am.

If Wei can do a few hours on the 23rd, 24th, or 25th, that would be ideal. I would estimate about 3 hours.

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502  
Phone: 850-435-7059  
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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Sent:** Tuesday, October 10, 2023 9:39 AM

**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>

**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

Assuming you are only seeking a half-day with Ms. Wei, that may change her availability. We will coordinate with Ms. Wei and Mr. Kalra to see if there is a single day, or adjacent days, in the coming weeks that they are both available.

With respect to your meet and confer request, we are checking our availability and will circle back.

Kind regards,  
Katelyn

**Katelyn VanDoorne**

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---

**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Sent:** Tuesday, October 10, 2023 10:51 AM

**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>

**Subject:** [EXTERNAL] RE: Gromov v. Belkin - request for deposition dates

Katelyn,

OK, we will depose Nick Kalra in LA on the 24th.

I would like to do it in person, as well as Ms. Wei. Can she be available on the same day or an adjacent day?

If they will both turn up to your offices, then it would be nice to do one say at 10am and the other at 2pm.

I would like to pin down Mr. Von Boode to a specific date. What about Nov. 14?

With Mr. Gromov's deposition, the 17th next week is no longer available (and I don't know that you have ever cleared the conflict on your side anyway). However, I will get you another date if you throw out some days that do work.

Finally, in light of the court's order, I think it would be a good idea for us to have another call. Can you be available on the 16th or the 18th of this month?

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.

316 South Baylen Street, Suite 600, Pensacola, Florida 32502

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Sent:** Monday, October 9, 2023 12:52 PM

**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>

**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

As a follow up to my previous email, Mr. Kalra has informed us that he is available on October 24. To minimize the disruptions to his personal and professional obligations, Mr. Kalra has asked if his deposition can take place remotely. There are, of course, no issues on our side. Please let us know if you are amenable to a remote deposition. To that end, we are happy to discuss an agreement whereby both sides take the requested depositions remotely (this would include Mr. Gromov). Please let us know your thoughts.

Thanks,  
Katelyn

**Katelyn VanDoorne**

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---

**From:** VanDoorne, Katelyn

**Sent:** Monday, October 9, 2023 9:45 AM

**To:** 'Bill Cash' <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>

**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

I am writing regarding the requested depositions in this matter. With respect to the depositions requested by Plaintiff:

- Mr. Kalra is speaking with his current employer about the deposition and when he'll be able to take time off for the deposition.
- We are still working with Ms. Wei to confirm dates because, in order to appear for an in-person deposition, she will need to figure out childcare for her children. If we are able to conduct Ms. Wei's deposition by Zoom (so she can attend from home), she can be available on October 30 or November 1.
- Mr. Von Boode will be abroad until next week. Since he has been abroad for a number of weeks, he has asked that his deposition be scheduled in mid-November to allow him time to get settled and catch up at work.

You previously stated that Mr. Gromov is available on October 17 for his deposition. We are working to reschedule a conflict, but believe we can make that date work. In terms of the locations of the depositions, we are amenable to taking Mr. Gromov's deposition in Lake Forest where he is located, if we can do the depositions of the Belkin witnesses at Baker's office in Los Angeles.

Thanks,  
Katelyn

**Katelyn VanDoorne**

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**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Sent:** Thursday, October 5, 2023 9:50 AM

**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>

**Subject:** [EXTERNAL] RE: Gromov v. Belkin - request for deposition dates

Katelyn,

I think we have different definitions of what constitutes a “run to the court.” It has been three weeks with no offer at all from your side. I am glad to finally see evidence that there’s been contact with the witnesses. Let’s keep it going.

We are happy to discuss the logistics of where the witnesses will appear and will be flexible on it. But we don’t even have an offer from Belkin at all. LA could be fine—please put an actual date and location, of any type, on the board, and we can discuss whether it works. Chicago in fall is also a wonderful place to be. Please make some offers.

I do have specific questions.

- When did Von Boode’s parent die, and how long is he expected to be gone?
- How long will it take Kalra to get us deposition dates?
- What is the contact information for Von Boode and for Kalra?

You can also expect a set of 30(b)(6) topics from us soon. I would hope to promptly confer with you on the topics and get some dates on those witnesses as well.

Thank you.

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O’Brien, Barr, & Mougey, P.A.

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Sent:** Wednesday, October 4, 2023 4:06 PM

**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>

**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

As I indicated below, we are working diligently to coordinate dates and times for the individuals you wish to depose. Your insistence to run to court despite our communication is unproductive, particularly in light of the fact that we agreed to the

discovery extension you suggested. You are certainly entitled to file whatever motion you wish, but we reiterate again that we are working to organize these depositions and to provide dates and times as soon as they can be confirmed.

Moreover, we have come back to you with questions regarding deposition logistics, so we can better plan for these depositions and facilitate the process for everyone involved. To that end, please let us know if you have a location in mind for the depositions you wish to take. As you know, under the Federal Rules, the noticing party has the right to select the location, subject to certain geographical limits. We are happy to meet and confer with respect to the depositions here to determine whether they will be held (i) at a location designated by the noticing party per the Federal Rules; or (ii) in a location more convenient for the witnesses. If the latter, we are happy to host the Belkin deponents at Baker's offices in LA. Let's discuss, so we can reach an agreement to handle the depositions on both sides in a consistent manner.

With respect to the requested deponents, we can presently confirm that:

- Mr. Von Boode is currently abroad due to the death of a parent. Belkin agrees to produce Mr. Von Boode for a deposition once he has returned to the United States. If the court does not extend the discovery deadline per the parties' request, we nevertheless are willing to produce Mr. Von Boode for a deposition after the discovery cut off.
- Mr. Kalra is in the process of confirming with his current employer's legal department that his deposition in this case will not pose an issue with his current employment. We do not anticipate any issues here, but want him to feel comfortable about this process. Following this confirmation, Mr. Kalra will firm up his availability to us.
- We are working with Ms. Wei to confirm her availability and will provide dates shortly.

Please let me know if you'd like to discuss.

Best,  
Katelyn

**Katelyn VanDoorne**  
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**Baker  
McKenzie.**

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---

**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Sent:** Wednesday, October 4, 2023 8:38 AM  
**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)) <[gblankinship@FBGLaw.com](mailto:gblankinship@FBGLaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>  
**Subject:** [EXTERNAL] RE: Gromov v. Belkin - request for deposition dates

Katelyn,

I just got your e-mail in which you said you "hope to revert shortly" with deposition dates. There is no explanation as to why it has taken 20 days since we first asked and we still don't have an answer. Have you made contact with any of these yet? Your predecessor told

us you were already in contact with Von Boode. We are putting together a filing for the court.

You can expect us to take them in person.

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502  
Phone: 850-435-7059  
[www.levinlaw.com](http://www.levinlaw.com)

---

**From:** Bill Cash

**Sent:** Monday, October 2, 2023 1:57 PM

**To:** 'VanDoorne, Katelyn' <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; Scott Warrick ([swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)) <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Jason Ibey <[jason@kazlg.com](mailto:jason@kazlg.com)>; Abbas Kazerounian, Esq. ([ak@kazlg.com](mailto:ak@kazlg.com)) <[ak@kazlg.com](mailto:ak@kazlg.com)>; Bradley Silverman ([BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)) <[BSilverman@fbfglaw.com](mailto:BSilverman@fbfglaw.com)>; Greg Blankinship ([gblankinship@FBFGLaw.com](mailto:gblankinship@FBFGLaw.com)) <[gblankinship@FBFGLaw.com](mailto:gblankinship@FBFGLaw.com)>; Matt Schultz <[MSchultz@levinlaw.com](mailto:MSchultz@levinlaw.com)>; Tracy Gilbert <[tgilbert@levinlaw.com](mailto:tgilbert@levinlaw.com)>

**Subject:** RE: Gromov v. Belkin - request for deposition dates

Dear Belkin colleagues,

This is Gromov's fifth request for deposition dates of Belkin employees, and it's been 18 days since we first asked (September 14). You did not even tell us that Nick Kalra is not a Belkin employee until September 24. You have provided no way to contact Kalra or Von Boode and have left open the door that you might "represent them." That leaves it unclear whether we can ethically reach out directly or not.

Discovery closes October 31 and these depositions may well lead to the identity of other witnesses we want to depose. Time is running out.

If we do not get some proposed dates or witness contact information immediately, we will go to the court and ask for some.

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502  
Phone: 850-435-7059  
[www.levinlaw.com](http://www.levinlaw.com)

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Sent:** Monday, September 25, 2023 11:04 AM  
**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>  
**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

We will reach out to Mr. Van Boode and Mr. Kalra regarding your desire to depose them, as we will likely be representing them. We will circle back shortly.

Thanks,  
Katelyn

**Katelyn VanDoorne**  
Associate, Litigation & Government Enforcement  
Baker & McKenzie LLP  
300 East Randolph Street, Suite 5000  
Chicago, IL 60601 United States  
Tel: +1 312 861 3700  
Fax: +1 312 698 2878  
Cell: +1 816 244 4709  
[katelyn.vandoorne@bakermckenzie.com](mailto:katelyn.vandoorne@bakermckenzie.com)



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**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Sent:** Monday, September 25, 2023 10:45 AM  
**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>  
**Subject:** [EXTERNAL] RE: Gromov v. Belkin - request for deposition dates

Good morning,

We want to depose Mr. Kalra about his involvement with Belkin's power banks. Can you give us his contact information as well?

### **Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502  
Phone: 850-435-7059  
[www.levinlaw.com](http://www.levinlaw.com)

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Sent:** Sunday, September 24, 2023 8:35 PM  
**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>  
**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

We are working to get you deposition dates as well as Mr. Van Boode's information. Please note that Mr. Kalra also is no longer employed by Belkin. If you would like to provide us with the testimony topics that you are seeking through Mr. Kalra, we can determine the appropriate witness.

Thanks,  
Katelyn

**Katelyn VanDoorne**  
Associate, Litigation & Government Enforcement  
Baker & McKenzie LLP  
300 East Randolph Street, Suite 5000  
Chicago, IL 60601 United States  
Tel: +1 312 861 3700  
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Cell: +1 816 244 4709  
[katelyn.vandoorne@bakermckenzie.com](mailto:katelyn.vandoorne@bakermckenzie.com)



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**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Sent:** Friday, September 22, 2023 11:47 AM  
**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>  
**Subject:** [EXTERNAL] RE: Gromov v. Belkin - request for deposition dates

Katelyn,

Thanks for the info. We are running out of time here so I am looking for a speedy response. We want to depose Van Boode anyway, so can you give us his contact information?

I will be happy to find a date for Dennis's deposition. I will get back to you.

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502

Phone: 850-435-7059

[www.levinlaw.com](http://www.levinlaw.com)

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Sent:** Friday, September 22, 2023 11:23 AM

**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>

**Subject:** RE: Gromov v. Belkin - request for deposition dates

Bill,

We are discussing these depositions with our client and will provide dates once we are able to confirm availability. Please note that Mr. Van Boode is no longer employed by Belkin. If you would like to provide us with the testimony topics that you are seeking through Mr. Van Boode, we can determine the appropriate witness.

We would like to depose Mr. Gromov. Please provide us with dates during the first two weeks of October that work for your team.

Best,  
Katelyn

**Katelyn VanDoorne**

Associate, Litigation & Government Enforcement

Baker & McKenzie LLP

300 East Randolph Street, Suite 5000

Chicago, IL 60601 United States

Tel: +1 312 861 3700

Fax: +1 312 698 2878

Cell: +1 816 244 4709

[katelyn.vandoorne@bakermckenzie.com](mailto:katelyn.vandoorne@bakermckenzie.com)

**Baker  
McKenzie.**

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**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Sent:** Thursday, September 21, 2023 7:54 AM

**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>

**Subject:** [EXTERNAL] Re: Gromov v. Belkin - request for deposition dates

Hello,

Can I get a response to this email from a week ago? I want to set these depositions. Thank you.

Bill Cash III  
Levin Papantonio Rafferty  
Pensacola, Fla.

Direct: 850-435-7059  
Mobile: 614-264-1342

---

**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Sent:** Thursday, September 14, 2023 8:41:22 AM  
**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>  
**Subject:** Gromov v. Belkin - request for deposition dates

OK.

We are requesting the following depositions:

- Norbert Von Boode
- Jen Warren Wei
- Nick Kalra

Please provide us some dates during the first two weeks of October.

We are also going to ask for a 30(b)(6) deposition. However, as Belkin still hasn't concluded its document production, we are not able to do that yet. When will you finish the production?

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502  
Phone: 850-435-7059  
[www.levinlaw.com](http://www.levinlaw.com)

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>  
**Sent:** Thursday, September 14, 2023 9:25 AM  
**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>  
**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>  
**Subject:** RE: Gromov v. Belkin International, Inc. (1:22-cv-06918) - Joint Status Report

Bill,

We'll await your draft.

Thanks,  
Katelyn

**Katelyn VanDoorne**

Associate, Litigation & Government Enforcement  
Baker & McKenzie LLP  
300 East Randolph Street, Suite 5000  
Chicago, IL 60601 United States  
Tel: +1 312 861 3700  
Fax: +1 312 698 2878  
Cell: +1 816 244 4709  
[katelyn.vandoorne@bakermckenzie.com](mailto:katelyn.vandoorne@bakermckenzie.com)



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**From:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Sent:** Thursday, September 14, 2023 9:18 AM

**To:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; [bsilverman@fbfglaw.com](mailto:bsilverman@fbfglaw.com); [gblankinship@fbfglaw.com](mailto:gblankinship@fbfglaw.com); [jason@kazlg.com](mailto:jason@kazlg.com); Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; [ak@kazlg.com](mailto:ak@kazlg.com)

**Subject:** [EXTERNAL] RE: Gromov v. Belkin International, Inc. (1:22-cv-06918) - Joint Status Report

Hi Katelyn,

Welcome to the case. I'm your contact on this and am working on the same here. I will send you our draft as soon as possible.

**Bill Cash III**

*Of Counsel*

Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr, & Mougey, P.A.  
316 South Baylen Street, Suite 600, Pensacola, Florida 32502  
Phone: 850-435-7059  
[www.levinlaw.com](http://www.levinlaw.com)

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**From:** VanDoorne, Katelyn <[Katelyn.Vandoorne@bakermckenzie.com](mailto:Katelyn.Vandoorne@bakermckenzie.com)>

**Sent:** Thursday, September 14, 2023 9:15 AM

**To:** Bill Cash <[bcash@levinlaw.com](mailto:bcash@levinlaw.com)>

**Cc:** Totino, Edward <[Edward.Totino@bakermckenzie.com](mailto:Edward.Totino@bakermckenzie.com)>; Sims, Nancy <[Nancy.Sims@bakermckenzie.com](mailto:Nancy.Sims@bakermckenzie.com)>; Shapiro, Peter <[Peter.Shapiro@bakermckenzie.com](mailto:Peter.Shapiro@bakermckenzie.com)>; [bsilverman@fbfglaw.com](mailto:bsilverman@fbfglaw.com); [gblankinship@fbfglaw.com](mailto:gblankinship@fbfglaw.com); [jason@kazlg.com](mailto:jason@kazlg.com); Scott Warrick <[swarrick@levinlaw.com](mailto:swarrick@levinlaw.com)>; Matt Schultz <[mschultz@levinlaw.com](mailto:mschultz@levinlaw.com)>; [ak@kazlg.com](mailto:ak@kazlg.com)

**Subject:** Gromov v. Belkin International, Inc. (1:22-cv-06918) - Joint Status Report

**CAUTION:** This email  
message is EXTERNAL.

Counsel,

As you may know, Patricia Mathy is no longer with Baker McKenzie. I will be taking over this matter in her place, and I would appreciate if you could copy me, as well as my colleague Peter Shapiro (CC'd), on all correspondence going

forward. Per Judge Fuentes' June 29 order, the parties have a joint written status report on discovery progress and settlement status due at 12:00 p.m. CT today. We can put a draft together and circulate later this morning.

Thanks,  
Katelyn

**Katelyn VanDoorne**

Associate, Litigation & Government Enforcement

Baker & McKenzie LLP

300 East Randolph Street, Suite 5000

Chicago, IL 60601 United States

Tel: +1 312 861 3700

Fax: +1 312 698 2878

Cell: +1 816 244 4709

[katelyn.vandoorne@bakermckenzie.com](mailto:katelyn.vandoorne@bakermckenzie.com)



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